BROWNSTEIN & ASSOCIATES, P.C.

Attorneys at Law

HOWARD B. BROWNSTEIN*

* NJ & NY BAR

April 1, 2020

Via Email: Lisette_Rodriguez@njd.uscourts.gov

Hon. Brian R Martinotti, U.S.D.J. United States District Court District of New Jersey 50 Walnut Street Newark, New Jersey 07101

Re: United States of America v. Juan Rojas Hernandez

Crim. No.: 19-888-BRM

Dear Judge Martinotti:

A Schedule Order in connection with the above-referenced matter was filed on March 6, 2020. [Docket No.: 32]

With consent from Assistant United States Attorney Cymetra Williams, it is respectfully requested that the Motion Schedule be postponed to May 15, 2020. Due to the Covid-19 pandemic situation, I have not had the opportunity of consulting with my client who is currently detained. I am 73 years-old and considered vulnerable to the virus.

Additionally, it is respectfully requested that Mary F. Khellah, Esq., be appointed to serve as Associate Counsel in connection with this matter.

Thank you for your time and attention.

Respectfully requested, BROWNSTEIN BOOTH & ASSOCIATES

s/ Howard Brownstein HOWARD B. BROWNSTEIN, ESQ.

Cc: Cymetra Williams, AUSA-Via email only